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Plaintiffs' Co-Lead Counsel

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

CIVIL L.R. 7-11 and 79-5(f)

Judge: Hon. Vince Chhabria
Special Master Daniel Garrie
Courtroom: 4, 17th Floor

Pursuant to Civil Local Rules 7-11 and 79-5(f) and the Stipulated Protective Order entered by the Court on August 17, 2018 (Dkt. No. 122), Plaintiffs hereby submit this Administrative Motion to Consider Whether Another Party's Materials Should Be Sealed.

	Documents	Portions Sought to be Sealed	Evidence Offered in Support of Sealing
1	Plaintiffs' Corrected Supplemental Brief in Support of Sanctions	Limited Portions at Pages i, 9, 10, 11, 12, 13, 14, 15, 16, 17, 19, 20, 24, 31, 32	Defendant to provide evidence, per Local Rule 79-5(f)
2	Corrected Declaration of Lesley E. Weaver in Support of Plaintiffs' Corrected Supplemental Brief in Support of Sanctions	Limited Portions of ¶¶ 4, 5, 5.A, 5.B, 5.C, 14, 15, 16, 18, 45, 46, 47, 53	Defendant to provide evidence, per Local Rule 79-5(f)
3	Corrected Exhibit 95 to the Corrected Declaration of Lesley E. Weaver	40:1-25, 41:6-7, 41:14-42:19, 42:22, 55:1-16, 56:9-25, 64:17-65:4, 65:16-25, 69:11-25	Defendant to provide evidence, per Local Rule 79-5(f)
4	Corrected Exhibit 106 to the Corrected Declaration of Lesley E. Weaver	76:1-25, 90:1-25, 92:1-25, 94:1-25, 101:1-9, 101:14-25, 104:1-10, 104:15-105:25, 118:1-119:3, 119:18-23, 130:5-14, 161:1-25, 163:1-165:18, 165:24-168:5, 168:15-170:18, 182:1-25, 216:1-18, 219:24-25, 223:1-2, 224:1-225:1, 226:4-25, 240:1-24, 250:1-25; Dep. Exs. 7 & 13 in Their Entirety	Defendant to provide evidence, per Local Rule 79-5(f)
5	Exhibit 140 to the Corrected Declaration of Lesley E. Weaver	Entire document	Defendant to provide evidence, per Local Rule 79-5(f)
6	Exhibit 141 to the Corrected Declaration of Lesley E. Weaver	Entire document	Defendant to provide evidence, per Local Rule 79-5(f)
7	Exhibit 142 to the Corrected Declaration of Lesley E. Weaver	Entire document	Defendant to provide evidence, per Local Rule 79-5(f)

Because the above documents contain, reference, or summarize materials designated

“Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order entered in this action, Plaintiffs file the documents provisionally under seal. Pursuant to Local Rule 79-5(f)(3), Defendant, as the Designating Party, bears the responsibility to establish that its designated materials are sealable.

Dated: August 24, 2022

Respectfully submitted,

KELLER ROHRBACK L.L.P.

BLEICHMAR FONTI & AULD LLP

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Derek W. Loeser

By: /s/ Lesley E. Weaver
Lesley E. Weaver

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the signatories. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24th day of August, 2022 in Oakland, California.

By: /s/ Lesley E. Weaver
Lesley E. Weaver

CERTIFICATE OF SERVICE

I, Lesley E. Weaver, hereby certify that on August 24, 2022, I electronically filed the foregoing document with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which will send electronic notification to all counsel of record. I also caused a copy of the under seal filing to be delivered to counsel for Defendant Facebook, Inc. via electronic mail.

/s/ Lesley E. Weaver
Lesley E. Weaver